

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	

COMMENTS OF COMCAST CORPORATION

Comcast Corporation (“Comcast”) submits these comments in response to the Public Notice issued on June 20, 2018 in the above-captioned proceeding.¹ The Public Notice seeks input for the Consumer and Governmental Affairs Bureau’s forthcoming report (to be prepared in consultation with the Federal Trade Commission’s Bureau of Consumer Protection) on “progress made by industry, government, and consumers in combatting illegal robocalls.”² While much more work is yet to be done in this space, Comcast is pleased to report that significant progress has been made on various fronts to tackle this problem and that further important efforts are underway, as discussed in greater detail below.

DISCUSSION

As an initial matter, the Commission itself has taken several laudable steps recently to pave the way for innovative industry initiatives in this arena. For instance, the Commission has taken concrete action on the problem of fraudulent robocalls that rely on caller ID spoofing to deceive consumers, most notably by adopting an order allowing voice providers to block spoofed

¹ See Public Notice, *Consumer and Governmental Affairs Bureau Seeks Input for Report on Robocalling*, DA 18-638, CG Docket No. 17-59 (Jun. 20, 2018) (“Public Notice”).

² *Id.* at 1 (quoting *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 9706 ¶ 63 (2017) (“*Robocall Blocking Order*”)).

calls appearing to originate from numbers on a Do-Not-Originate (“DNO”) list or from invalid, unallocated, or unassigned numbers,³ and by seeking comment on whether to permit other forms of call blocking under its rules.⁴ The Commission also has opened a separate proceeding on examining and promoting the development of the end-to-end call authentication standard known as SHAKEN/STIR⁵—which, as Comcast has explained, currently represents the most promising way of addressing illegal spoofed robocalls in a comprehensive and robust manner.⁶ In connection with that initiative, the Commission recently received a report from the North American Numbering Council’s (“NANC’s”) Call Authentication Trust Anchor Working Group on the governance framework and timely deployment of that protocol⁷—a report that Chairman Pai called “a substantial step forward in ensuring that calls can be authenticated and verified.”⁸

³ See *Robocall Blocking Order* ¶ 1.

⁴ See *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Notice of Proposed Rulemaking and Notice of Inquiry, 32 FCC Rcd 2306 ¶ 28 (2017) (seeking comment on various potential “objective standards that would indicate to a reasonably high degree of certainty that a call is illegal and whether to adopt a safe harbor to give providers certainty that they will not be found in violation of the call completion and other Commission rules when they block calls based upon an application of objective standards”).

⁵ See generally *Call Authentication Trust Anchor*, Notice of Inquiry, 32 FCC Rcd 5988 (2017). SHAKEN (Signature-based Handling of Asserted Information Using toKENs) and STIR (Secure Telephone Identity Revisited) together refer to a framework and set of specifications for verifying and authenticating caller identification for IP-based voice calls. See *id.* ¶ 5.

⁶ See Comments of Comcast Corp., WC Docket No. 17-97, at 2 (filed Aug. 14, 2017).

⁷ See NANC Call Authentication Trust Anchor Working Group, “Report on Selection of Governance Authority and Timely Deployment of SHAKEN/STIR” (May 3, 2018), available at https://transition.fcc.gov/Daily_Releases/Daily_Business/2018/db0503/DOC-350542A1.pdf.

⁸ Press Release, *Chairman Pai Welcomes Call Authentication Recommendations from the North American Numbering Council* (May 14, 2018), available at

And the Commission has taken additional steps to educate itself about and foster the development of private-sector tools for mitigating illegal robocalls—including by co-hosting a robocall policy forum in March of this year attended by numerous policymakers, industry stakeholders, and consumer advocates,⁹ followed by an expo in April featuring technologies and applications aimed at minimizing the illegal robocalls consumers receive.¹⁰

In conjunction with the Commission’s ongoing activity in this arena, industry stakeholders have made substantial progress in developing and implementing solutions to mitigate illegal robocalls, and Comcast is proud to be at the forefront of these efforts. Comcast’s Chris Wendt co-chairs the work group of the Alliance for Telecommunications Industry Solutions on the SHAKEN framework for caller ID authentication, is a primary author of the STIR specifications adopted by the Internet Engineering Task Force, and leads the development team pioneering an open source implementation of the specifications to promote testbeds and interoperability lab trials in the industry. Mr. Wendt also co-chaired the Authentication Work Group of the Robocall Strike Force, which was organized in 2016 “to accelerate the development and adoption of new tools and solutions to abate the proliferation of illegal and unwanted robocalls” and “to promote greater consumer control over the calls they wish to receive.”¹¹

https://transition.fcc.gov/Daily_Releases/Daily_Business/2018/db0514/DOC-350690A1.pdf.

⁹ See Public Notice, *Agenda for the FCC-FTC Joint Policy Forum on Fighting the Scourge of Illegal Robocalls* (Mar. 23, 2018), available at https://transition.fcc.gov/Daily_Releases/Daily_Business/2018/db0319/DOC-349785A1.pdf.

¹⁰ See Public Notice, *FCC and FTC to Co-Host Expo on April 23 Featuring Technologies to Block Illegal Robocalls* (Apr. 16, 2018), available at <https://docs.fcc.gov/public/attachments/DOC-350238A1.pdf> (“Expo PN”).

¹¹ See Robocall Strike Force, Robocall Strike Force Report, at 1 (Oct. 26, 2016), available at <https://transition.fcc.gov/cgb/Robocall-Strike-Force-Final-Report.pdf>.

Moreover, Comcast's Beth Choroser co-chaired the NANC's Call Authentication Trust Anchor Working Group, which submitted the above-referenced report on SHAKEN/STIR's deployment and governance framework to the Commission.

In addition to pioneering the development of these solutions, Comcast is leading the way on their implementation. Comcast has been actively participating in SHAKEN/STIR testbeds along with other voice providers, and plans to conduct network trials of SHAKEN/STIR prior to the end of 2018 and scale to fuller implementation during 2019. Comcast also has provided open source code for implementation of SHAKEN/STIR that vendors and other providers of voice services have begun to use. Additionally, Comcast has begun implementing specific robocall mitigation techniques authorized by the Commission's recent *Robocall Blocking Order*.¹² Comcast has already configured edge devices on its voice network to implement blocking of calls from numbers on the industry DNO list,¹³ and thousands of fraudulent robocalls are blocked through this method each month. In the near future, Comcast plans to begin deployment of a centralized capability for blocking calls appearing to originate from certain invalid and unallocated numbers. This centralized capability will enable Comcast not only to block a significantly greater volume of fraudulent robocalls, but also to move quickly in adding or removing numbers or ranges of numbers to be blocked as appropriate.

In a further effort to empower consumers, Comcast offers Nomorobo compatibility with its residential voice product (XFINITY Voice) at no additional cost, and provides information on

¹² See *supra* note 3 and accompanying text.

¹³ Comcast also participates in the Industry Traceback Group, whose coordinated efforts to trace fraudulent calls to their source result in some cases in a consensus decision to add a particular number to the DNO list pursuant to a Commission-approved standard. See *Robocall Blocking Order* ¶ 13.

its website about how to activate Nomorobo in conjunction with its voice service.¹⁴ Nomorobo is a third-party cloud-based service that can be configured by consumers to block various types of robocalls, and was featured at the Commission’s expo on robocall mitigation technologies in April.¹⁵ The availability of this service has had a very significant impact on the number of fraudulent robocalls reaching Comcast’s customers; as an illustration, for the hundreds of thousands of Comcast customers that have signed up for Nomorobo already, Comcast estimates that the service blocked over 10 million fraudulent robocalls in June 2018 alone.

CONCLUSION

In light of the efforts noted above, Comcast fully expects that the Consumer and Governmental Affairs Bureau will be in a position to report that there has been significant “progress made by industry, government, and consumers in combatting illegal robocalls,”¹⁶ and that consumers can expect to see further reductions in these calls going forward (especially as SHAKEN/STIR is more widely adopted and implemented). Comcast looks forward to continuing its close work with the Commission on this important issue.

¹⁴ See Comcast Corp., “How to Stop Unsolicited Robocalls to Your Home,” <https://www.xfinity.com/support/phone/nomorobo/>.

¹⁵ See Expo PN at 1.

¹⁶ Public Notice at 1 (internal quotation marks and citation omitted).

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